

DECLARATION OF WILLIAM W. FICK, ESQ.

I, William W. Fick, declare as follows:

1. I am an attorney licensed in the Commonwealth Massachusetts.
2. I am counsel of record for Kseniia Petrova in *United States v. Petrova*, No. 1:25-cr-10272-LTS, the criminal case pending against her in the United States District Court for the District of Massachusetts (“the criminal case”).
3. Around the time Ms. Petrova first appeared in the District of Massachusetts, counsel for the government proposed to resolve the criminal case by way of a Deferred Prosecution Agreement (“the proposed DPA”).
4. Under the proposed DPA, Ms. Petrova would agree to the filing of a criminal Information charging her with one count of making a false statement, in violation of 18 U.S.C. § 1001. Ms. Petrova would be required to stipulate to the accuracy of the Information and a Statement of Agreed Facts. Absent a material breach by Ms. Petrova of her obligations under the proposed DPA, the government would file a dismissal of the charge in the Information after twelve months.
5. As part of the proposed DPA, Ms. Petrova would also be required to withdraw any pending immigration applications and depart the United States to a country of her choice. She would be barred from applying for re-admission to the United States for a period of five years.
6. The government set a deadline for Ms. Petrova to accept the terms of the proposed DPA by June 24, 2025.
7. Through counsel, Ms. Petrova declined the offer of a DPA on June 24, 2025.
8. On June 25, 2025, the government obtained an indictment against Ms. Petrova.

I declare on this 7th day of July 2025, under the pains and penalties of perjury, that the foregoing is true and correct.

/s/ William W. Fick